

Kubo, Teresa

From: Vallette, Yvonne
Sent: Monday, March 25, 2013 7:00 AM
To: Kubo, Teresa
Subject: RE: I-5 corridor Reinforcement

Teresa: You are right on about the West Alt (in that though it may have more wetland acreage involved, those wetlands are of lower quality) vs. the Central Alt. The Corp has also brought up this same issue (but they feel sort of stuck between a rock and a hard place in that the 404(b)(1) guidelines are being followed in principal by BPA- but for some reason BPA has really been pushing for the Central Alt as their preferred alt). So I think that via the DEIS review that your comments are right on in pointing out that the differences between the alternatives needs to consider more than just "acres" especially since 404 involves more than just wetlands (i.e. the additional stream crossings that would be required of the Central Alt. So your comments about BMPs are excellent. So overall, I don't can't think of another thing to add or change to your draft letter.

From: Kubo, Teresa
Sent: Friday, March 22, 2013 4:40 PM
To: Vallette, Yvonne
Subject: I-5 corridor Reinforcement

Hi Yvonne –

Sorry for so many emails! I am wondering if anyone in ARU has or intends to submit comments on the Corps public notice for the I-5 Corridor Reinforcement project? Comments are due Monday, as are comments on the EIS prepared by BPA. I am attaching my draft comments as an FYI. BPA has identified a preferred alternative (Central Alternative) that would require an entirely new ROW (77 miles). The EIS tries to cast the Central Alternative and new ROW as being less impactful to wetlands because there are fewer wetland acres present along that corridor. They do not take into consideration that the acres in the existing ROW (West Alternative) are already impacted and likely functioning at a lower level. They have done a detailed desk analysis, and a couple of field validation efforts, but no on-the-ground wetland assessment has been done.

I'd love to get your thoughts on the NEPA comments even if ARU is not going to comment on the PN. Thanks!!

Take care,

Teresa